

EXHIBIT “B”

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
LAUREN VASQUEZ,

Plaintiff,

-against-

J.B. HUNT TRANSPORT, INC.
and NICHROY M. TRACEY,

Defendants.
-----X

Docket No.: 1:19-CV-0

NOTICE OF REMOVAL

Supreme Court, Queens
County Index No.: 7040971/2020

The defendants, **J.B. HUNT TRANSPORT, INC. and NICHROY M. TRACEY**, remove this action from the Supreme Court, Queens County to the United States District Court for the Eastern District of New York.

1. The plaintiff commenced this action against **J.B. HUNT TRANSPORT, INC. and NICHROY M. TRACEY**, in the Supreme Court of the State of New York, Queens County. A copy of the complaint is attached as **Exhibit "A"**.

2. The plaintiff, Lauren Vasquez, is a citizen of the State of New York and was a citizen of the State of New York when this action was started in state court.

3. The defendants are citizens of a state other than the State of New York and were citizens of a state other than the State of New York when this action was started in state court.

a.) J.B. Hunt Transport, Inc. is (and was) a corporation incorporated in the State of Georgia with its principal place in business in Lowell, Arkansas.

b.) Nichoy M. Tracey, upon information and belief, resides and has been residing in Irvington New Jersey, Essex County when this action was started in state court. Nichoy M. Tracey is a citizen of the State of New Jersey, County of Essex.

4. J.B. Hunt Transport, Inc. was served on May 18, 2020.

5. This court has subject-matter jurisdiction over this action under section 1332(a)(1) of the Judicial Code, 28 U.S.C. § 1332(a)(1), because this action—both now and when it was started—is between citizens of different states and the matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs.

6. The defendants may, under section 1441(a) of the Judicial Code, 28 U.S.C. § 1441(a), remove this action to this court because this is a civil action of which the District Courts of the United States have original jurisdiction that is brought in a state court.

7. All defendants join in the removal of this action to this Court.

Dated: New York, New York
June 16, 2020

RAWLE & HENDERSON LLP
Attorneys for Defendants
J.B. HUNT TRANSPORT, INC.
and NICHOLY M. TRACEY



By: _____

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AFFIDAVIT OF SERVICE

STATE OF NEW YORK)
 :ss.:
COUNTY OF NEW YORK)

LISA M. HAILEY, being duly sworn, deposes and says:

I am not a party to this action, I am over 18 years of age and I reside in Kings County, New York.

On June 16, 2020, I served the within **CIVIL COVER SHEET** and **NOTICE OF REMOVAL (with accompanying Exhibit “A” – Summons and Complaint)** upon the parties listed below at the addresses designated by said party for that purpose by depositing a true copy of same enclosed in a postpaid, properly addressed wrapper, in an official depository under the exclusive care and custody of the United States Postal Service within the State of New York and by **ECF**.

TO: Kevin G. Lillis, Esq.
 MULLANEY & GJELAJ, PLLC
 100-09 Metropolitan Avenue
 Forest Hills, New York 11375
 Attorney for Plaintiff
 LAUREN VASQUEZ
 E-Mail: klillis@maglawyers.com
 Telephone No.: 1 (718) 821-8100
 Fax No.: 1 (718) 785-9570

Lisa M. Hailey

LISA M. HAILEY

Sworn to before me this
16th day of June, 2020



NOTARY PUBLIC

Shari L. DeMattia
Notary Public, State of New York
No. 01DE6001012
Qualified in Richmond County
Commission Expires, May 3, 2022